

**From:** [Ted Gavin](#)  
**To:** [Tab Turner](#)  
**Cc:** [Benjamin Brodsky](#); [Bard D. Rockenbach](#); [Joe Johnson](#); [Jeffrey V. Mansell](#); [Tiffany Craig](#); [Scott A. Hiaasen](#); [agarcia@rqmlawfirm.com](#); [Christian Kohlsaat](#); [Sean Santini](#)  
**Subject:** Re: SERVICE OF COURT DOCUMENT CASE NUMBER 132019CA031155000001 ECP Holdings III, LLC et al vs TradePAY Capital, LLC et al  
**Date:** Friday, May 01, 2020 5:53:52 PM

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Messrs. Turner and Brodsky,

SureFunding, LLC is a debtor-in-possession in a case filed in the United States Bankruptcy Court for the District of Delaware. The filing of a bankruptcy petition triggers the automatic stay on actions against the debtor, pursuant to section 362 of the bankruptcy code. However, the stay is the Debtor's stay and does not apply to matters in which the Debtor is a plaintiff; it stays action against the Debtor, and it is the Debtor's stay to waive. Accordingly, the stay is not a factor in the litigation referenced herein.

Regards,

**Ted Gavin, CTP**  
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On Fri, May 1, 2020 at 5:49 PM Tab Turner <[tab@tturner.com](mailto:tab@tturner.com)> wrote:

Mr. Gavin-

Can you please address the referenced concern about bankruptcy? Mr. Brodsky represents several defendants and is apparently concerned.

Tab Turner

TURNER & ASSOCIATES, P.A.

On May 1, 2020, at 2:02 PM, Benjamin Brodsky <[bbrodsky@bfwlegal.com](mailto:bbrodsky@bfwlegal.com)> wrote:

Hi guys, we understand that Surefunding LLC has filed a bankruptcy petition in Delaware. What is your position on whether that triggers an automatic stay? I think you have an obligation to inform the court.

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Benjamin H. Brodsky, Esq.

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From: [eservice@myflcourtagency.com](mailto:eservice@myflcourtagency.com) <[eservice@myflcourtagency.com](mailto:eservice@myflcourtagency.com)>

Sent: Friday, May 01, 2020 2:36 PM

Subject: SERVICE OF COURT DOCUMENT CASE NUMBER 132019CA031155000001 ECP Holdings III, LLC et al vs TradePAY Capital, LLC et al

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Court:

Eleventh Judicial Circuit in and for Miami-Dade County, Florida

Case #:

132019CA031155000001

Court Case #:

2019-031155-CA-01

Case Style:

ECP Holdings III, LLC et al vs Tradepay Capital, LLC et al

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ECP Holdings - NPNP re Standard Chartered Bank NY and Bank of China.pdf

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